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December 26, 2019

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

Re: Freedom of Information Act Request

To Whom It May Concern

This firm represents Rio Algom Mining LLC ("RAML") regarding potential liability for historic mining operations based on its present ownership of certain properties located in the Ambrosia Lake area of Grants, New Mexico. This letter constitutes a request for records pursuant to the Freedom of Information Act, 5 U.S.C. § 522 et seq., and corresponding regulations.

We request copies of any and all documents relating to or concerning the United States Environmental Protection Agency's ("EPA") Regions 9 and 6 meetings with representatives of the Navajo Nation (including, but not limited to, the Navajo Nation Environmental Protection Agency and Department of Justice), the New Mexico Environmental Department and the New Mexico Mining and Minerals Division regarding coordination, cooperation, project identification, funding, prioritization (and associated methodology) or use of the funds obtained from settlements with Tronox and Anadarko and designated for use at Navajo Abandoned Uranium Mines.¹ ("NAUM Stakeholder meetings")

Specifically, we are requesting copies of all notes taken by EPA contractors, consultants, representatives, agents and employees, including the facilitator, that were authored or obtained contemporaneously during those meetings, as well as all notes and communications created afterwards, which in any manner reflect the statements, positions and discussions amongst the participants, for all NAUM Stakeholder meetings that have taken place from January 1, 2017 up through the present. We are also requesting all agendas, minutes or other documents which were disseminated or created for the purposes of preparation for those NAUM Stakeholder meetings.

¹ NAUM shall have the same meaning as provided in Subparagraph 117(p) of the Consent Decree and Environmental Settlement Agreement between the United States and EPA, lodged with the United States Bankruptcy Court of the Southern District of New York on November 23, 2010.

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Some of these requested documents should have been provided as part of the response to our Freedom of Information Act Request dated December 14, 2018, but were not. Please see the attached, bullet points #4, #5 and #8.

Please provide the requested documents immediately.

For purposes of this request, the term "documents" includes all written correspondence, agreements, notes, e-mails, memorandums, electronic media or other tangible forms in which information is stored, and other compilations from which information can be obtained, including all copies of a document which contain any additional writing, underlining, notes, deletions or any other markings or notations, or are otherwise not identical copies of the original.

We will accept hard copies of the requested documents or production of the documents in an agreed upon electronic format. If some of the documents become available to send before others, we will accept the production of the requested documents in multiple phases.

We agree to pay reasonable search and duplication fees for the processing of this request in an amount not to exceed \$1,500. Please notify me prior to incurring any expenses in excess of that amount.

If my request is denied in whole or part, please justify all such denials or deletions by reference to specific exemptions of the Act. We reserve the right to appeal your decision to withhold any information.

We look forward to your reply within 20 business days. If you have any questions or concerns, please contact me at 602.382.6286 or mjklein@swlaw.com.

Very truly yours,

Snell & Wilmer



— Mitchell Klein

MK::eh

cc: Laurie Williams, Assistant Regional Counsel, EPA Region 9